

Fill in this information to identify the case:

Debtor 1 Timothy A. Stewart aka Timothy Alan Stewart

Debtor 2 Gretchen W. Stewart aka Gretchen J. Stewart, fka Gretchen Joyce Wagner, aka Gretchen Wagner Gettens (Spouse, if filing)

United States Bankruptcy Court for the WESTERN District of Pennsylvania

Case number 15-23443 CMB

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: FREEDOM MORTGAGE CORPORATION

Court claim no. (if known): 8

Last 4 digits of any number you use to identify the debtor's account: 6090

Property address: 237 Roscommon Place
Number Name

McMurray, PA 15317
City, State Zip

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 11/1/2020

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ _____

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____

c. Total. Add lines a and b.

(c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

Debtor(s) Timothy A. Stewart, and Gretchen W. Stewart
CMB
First Name Middle Name Last Name

Case number (if known): 15-23443

Part 4:

Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- **all payments received;**
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/s/Brian C. Nicholas Esquire – Atty. ID. 317240

Signature

Date 11/16/2020

Print

Brian C. Nicholas

Title: Attorney for Creditor

Company KML Law Group, P.C.

If different from the notice address listed on the proof of claim to which this response applies:

Address 701 Market Street, Suite 5000
Number Street
Philadelphia, PA 19106
City State ZIP Code

Contact phone

201-549-5366

Email

bnicholas@kmlawgroup.com